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September 14, 2022

VIA ECF

The Honorable Jesse M. Furman, U.S.D.J.
U.S. District Court, Southern District of New York
40 Centre Street, Room 2202
New York, NY 10007

Re: *Shapiro v. John Doe Corp. I et al*
Case No.: 1:22-cv-05022-JMF

Dear Honorable Judge Furman:

This law firm represents Plaintiff Angel Shapiro (the “Plaintiff”) in the above-referenced matter.

Pursuant to Your Honor’s Individual Motion Practice Rules 2(A), 2(E) and 4(A), this letter respectfully serves as a request to adjourn the initial case conference scheduled for September 20, 2022 to a date and time after October 20, 2022.

The basis of the request is that the parties require additional time to comply with Your Honor’s June 16, 2022 Order [Dckt. No. 6].

A second, independent basis also necessitates the instant request. The undersigned counsel has conflicting travel obligations on September 20, 2022, and thus, will be unable to attend the September 20, 2022 conference.

This is the first request of its nature. This request is not made on consent of counsel for Defendants Venice Griffin, John Doe Corp. I. (together, the “Defendants”), on the basis that the undersigned counsel previously withheld “consent to not proceeding for a default” on August 22, 2022.¹

Thank you, in advance, for your time and attention to this matter.

The Court already adjourned the initial pretrial conference, *sine die*, when Defendants filed their motion to dismiss. See ECF No. 26. SO ORDERED.



September 14, 2022

Respectfully submitted,

LEVIN-EPSTEIN & ASSOCIATES, P.C.

By: /s/ Jason Mizrahi

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VIA ECF: All Counsel

¹ By way of background, the Court had ordered Plaintiff to comply with the August 8, 2022 Order on or before August 22, 2022. [Dckt. No. 12].